

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

ROY DEN HOLLANDER,

Plaintiff,

Civil Action No. 08-cv-4045(FB)(ECF)

v.

DEBORAH SWINDELLS DONOVAN,
PAUL W. STEINBERG, and
JANE DOE,

Defendants.

SUPPLEMENTAL COMPLAINT FOR COPYRIGHT INFRINGEMENT

In this Supplemental Complaint filed under Fed. R. Civ. P. 15, the plaintiff alleges additional relief in the alternative as follows:

Alternative Relief Sought

1. A proportion of the profits attributable to defendants Swindells-Donovan and Steinberg's infringement of the six essays as provided for under 17 U.S.C. § 504(b).
2. Both defendants Swindells-Donovan and Steinberg used the copyrighted essays in litigation for which, on information and belief, they made a monetary profit.
3. The amount by which the defendants profited from their unauthorized use of the essays is peculiarly within their knowledge, and, therefore, the plaintiff is unable to plead the actual amount.

Dated: March 2, 2009
New York, N.Y.

/S/

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